

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

SKAT TAX REFUND SCHEME LITIGATION

This document relates to:

1:19-cv-01781-LAK, 1:19-cv-01785-LAK, 1:19-cv-01791-LAK, 1:19-cv-01783-LAK, 1:19-cv-01788-LAK, 1:19-cv-01794-LAK, 1:19-cv-01798-LAK, 1:19-cv-01918-LAK, 1:19-cv-01922-LAK, 1:19-cv-01926-LAK, 1:19-cv-01928-LAK, 1:19-cv-01929-LAK, 1:19-cv-01931-LAK, 1:19-cv-01800-LAK, 1:19-cv-01803-LAK, 1:19-cv-01809-LAK, 1:19-cv-01812-LAK, 1:19-cv-01818-LAK, 1:19-cv-01792-LAK, 1:19-cv-01806-LAK, 1:19-cv-01808-LAK, 1:19-cv-01815-LAK, 1:19-cv-01870-LAK, 1:19-cv-01801-LAK, 1:19-cv-01810-LAK, 1:19-cv-01813-LAK

Master Docket 18-md-02865 (LAK)
ECF Case

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO THE AMENDED COMPLAINTS**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the current June 29, 2020 deadline for Defendants in the above-referenced actions to answer the Amended Complaints filed by plaintiff Skatteforvaltningen (“SKAT”) pursuant to the Court’s Order dated April 13, 2020 (Dkt. 317) shall be extended for four (4) days to and including July 3, 2020.

No provision of this Stipulation and Order shall be construed as a waiver of, and Defendants expressly reserve, any and all defenses.

This is the parties’ second request to modify the time to answer or otherwise respond to the Amended Complaints. By order dated May 14, 2020, this Court granted the Consolidated

Defendants' request to extend the time to answer or respond to SKAT's new and amended complaints to June 29, 2020. *See* Dkt. 336.

Dated: New York, New York
June 28, 2020

/s/ Michelle A. Rice

MICHELLE A. RICE

KAPLAN RICE LLP

142 West 57th Street, Suite 4A

New York, NY 10019

(212) 333-0227

mrice@kaplanrice.com

Attorney for Defendants Joseph Herman,

David Zelman, Edwin Miller, Ronald Altbach,

Perry Lerner, Robin Jones, Albedo

Management LLC Roth 401(K) Plan, Ballast

Ventures LLC Roth 401(K) Plan, Fairlie

Investments LLC Roth 401(K) Plan, Bareroot

Capital Investments LLC Roth 401(K) Plan,

Battu Holdings LLC Roth 401K Plan, Cantata

Industries LLC Roth 401(K) Plan, Dicot

Technologies LLC Roth 401(K) Plan,

Vanderlee Technologies Pension Plan, Cedar

Hill Capital Investments LLC Roth 401(K)

Plan, Fulcrum Productions LLC Roth 401(K)

Plan, Green Scale Management LLC Roth

401(K) Plan, Keystone Technologies LLC Roth

401(K) Plan, Tumba Systems LLC Roth 401(K),

Plan, Crucible Ventures LLC Roth 401(K)

Plan, Limelight Global Productions LLC Roth

401(K) Plan, Plumrose Industries LLC Roth

401K Plan, Roadcraft Technologies LLC Roth

401(K) Plan, True Wind Investments LLC Roth

401(K) Plan, Eclouge Industry LLC Roth

401(K) Plan, First Ascent Worldwide LLC

Roth 401(K) Plan, Loggerhead Services LLC

Roth 401(K) Plan, PAB Facilities Global LLC

Roth 401(K) Plan, Trailing Edge Productions

LLC Roth 401(K) Plan, Monomer Industries

LLC Roth 401(K) Plan, Pinax Holdings LLC

Roth 401(K) Plan, and Sternway Logistics LLC

Roth 401(K) Plan

/s/ John McGoey

(e-signed with Consent)

JOHN MCGOEY

HUGHES HUBBARD & REED LLP

One Battery Park Plaza

New York, NY 10004

(212) 837-6000

John.McGoey@hugheshubbard.com

Attorney for Plaintiff Skatteforvaltningen

SO ORDERED:

Hon. Lewis A. Kaplan
United States District Judge